

Fill in this information to identify the case:

Debtor 1 LUIS JAVIER OTERO PEDRAZA

Debtor 2 LINETTE RUIZ DIAZ  
(Spouse, if filing)

United States Bankruptcy Court for the: \_\_\_\_\_ District of Puerto Rico (Old San Juan)  
(State)

Case number 13-04290-ESL 13

## Form 4100R

### Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

#### Part 1: Mortgage Information

Name of creditor: RUSHMORE LOAN MANAGEMENT SERVICES AS SERVICE AGENT OF  
ROOSEVELT CAYMAN ASSET COMPANY II

Court claim no. (if known):  
10

Last 4 digits of any number you use to identify the debtor's account: 8812

Property address:

#### Part 2: Prepetition Default Payments

Check one:



Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.



Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

#### Part 3: Postpetition Mortgage Payment

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
MM/DD/YYYY



Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding:

+ (b) \$ 448.51

c. Total. Add lines a and b.

(c) \$ 448.51

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
MM/DD/YYYY

Debtor 1 **LUIS JAVIER OTERO  
PEDRAZA**  
First Name Middle Name Last Name

Case number (if known) **13-04290-ESL 13**

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

*Check the appropriate box::*

- I am the creditor.  
 I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/Sarah I. Vega Bonilla  
Signature

Date: 7/27/2018

Print **Sarah I. vega Bonilla** Title: Attorney for Creditor  
First Name Middle Name Last Name

Company Martinez & Torres Law Offices, P.S.C.

If different from the notice address listed on the proof of claim to which this response applies:  
Address \_\_\_\_\_

Number \_\_\_\_\_ Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP Code \_\_\_\_\_

Contact phone (787) 767-8244 Email: svega@martineztorreslaw.com

## UNITED STATES BANKRUPTCY COURT

## Certificate of Service

I hereby certify that a copy of the foregoing Statement in Response to Notice of Final Cure Payment was served on the parties listed below by postage prepaid U.S. Mail, First Class or served electronically through the Court's ECF System at the e-mail address registered with the Court on this Date: 07/31/2018

Debtor 1 Name:	LUIS JAVIER OTERO PEDRAZA
Debtor 2 Name:	LINETTE RUIZ DIAZ
Debtor's Mailing Address:	VILLAS DE CASTRO TT10 19 STREET CAGUAS, PR 00725

**MARTINEZ & TORRES LAW OFFICES, P.S.C.**  
P.O. Box 192938 San Juan, PR 00919-2938  
Tel. (787) 767-8244 & Fax (787) 767-1183

/s/ Sarah M. Vega Bonilla  
By: Sarah M. Vega Bonilla  
USDC -PR 303503  
svega@martineztorreslaw.com

Loan Number:	2	Prepared By: MELISSA CESAREO	Date: July 24-2018
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### Notice of Final Cure Checklist

Date NOFC was entered on docket:	7/11/2018
Deadline to respond to NOFC:	8/1/2018
Pre-petition Paid in Full:	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree (circle one)
Post-Petition Current:	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree (circle one)

If DISAGREE, please provide breakdown of any payments, fees and costs still outstanding below:

Contractual Payments Due					
Start date		End date	PMT AMT	# of PMTS	Total
	thru				\$0.00
	thru				\$0.00
	thru				\$0.00
	thru				\$0.00
	thru				\$0.00
	thru				\$0.00
	thru				\$0.00
	thru				\$0.00
				Suspense	
				Total	\$0.00

If AGREE, please provide current due date and amount:

Current Payment Due					
Start date		End date	PMT AMT	# of PMTS	Total
	thru				\$0.00
				Suspense	
				Total	\$0.00

Fees and Costs Outstanding (Include only recoverable amounts)	
Fee /Cost Description	Amount
TITLE COST	\$60.00
ACQUISITION	\$388.51
Total	\$448.51

Escrow Outstanding	
Escrow Description	Amount
Total	\$0.00

**TOTAL DUE \$448.51**

Quality Assurance Review By:	<i>MCC</i>	Date <i>07/24/2018</i>	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Denied	(circle one)
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Denial Reason:	   

Supervisor Review By:	<i>[Signature]</i>	Date <i>7-24-2016</i>	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Denied	(circle one)
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Denial Reason:	   

Comments:	   



## Loan Status

### Please Complete

#### Loan Status

Date NOFC Claim was entered on docket:

07/11/2018

Entered By: Melissa Cesareo-Melendez 7/24/2018 10:07:00 AM

Pre-Petition Paid in Full:

Agree

Entered By: Melissa Cesareo-Melendez 7/24/2018 10:07:00 AM

Post-Petition Current:

Agree

Entered By: Melissa Cesareo-Melendez 7/24/2018 10:07:00 AM

Provide Breakdown of any payments/ fees/ costs still owing:

448.51

Entered By: Melissa Cesareo-Melendez 7/24/2018 10:07:00 AM

Comments:

TITLE COST / ACQUISITION COST

Entered By: Melissa Cesareo-Melendez 7/24/2018 10:07:00 AM

Buddy/Supervisor checklist requirement reviewed?:

Acknowledged

Entered By: Melissa Cesareo-Melendez 7/24/2018 10:07:00 AM

[Clear](#)

[Edit](#)